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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,)	CR 12-0090 RS and
)	NO. CR 12-0156 RS
14 Plaintiff,)	
)	
15 v.)	STIPULATION AND [PROPOSED] ORDER
)	EXCLUDING TIME UNDER 18 U.S.C. § 3161
16 PABLO PEREZ-ANGUIANO,)	
17 a/k/a Jose Escalera Aguilera)	
)	
18)	
)	
19 Defendant.)	

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21 The parties in this case appeared before the Court on October 15, 2013. At that time, defense
22 counsel represented that additional time would be required to consult with her client and reach a possible
23 resolution in the case with the government. As a result, the Court set the matter to November 5, 2013.
24 *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

25 The parties have agreed to exclude the period of time between October 15, 2013, and November
26 5, 2013, from any time limits applicable under 18 U.S.C. § 3161. The parties agreed that granting the
27 exclusion would maintain continuity of counsel and allow the reasonable time necessary for effective
28 preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties also agreed that the ends of
Stipulation and ~~[Proposed]~~ Order Excluding Time
CR 12-0156 RS

justice served by granting such an exclusion of time outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). At the hearing, the Court made findings consistent with this agreement.

SO STIPULATED:

MELINDA HAAG
United States Attorney

DATED: October 15, 2013

/s/

CAROLYN SILANE
Special Assistant United States Attorney

DATED: October 15, 2013

/s/

CANDIS MITCHELL
Attorney for Defendant Pablo Perez-Anguiano

1 ~~PROPOSED~~ ORDER

2 For the reasons stated above and at the October 15, 2013, hearing, the Court finds that the
3 exclusion from the time limits applicable under 18 U.S.C. § 3161 of the period from October 15, 2013,
4 to November 5, 2013, is warranted and that the ends of justice served by the continuance outweigh the
5 best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). Denying the
6 requested exclusion of time would deprive the parties of the reasonable time necessary for effective
7 preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

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9 IT IS SO ORDERED.

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11 DATED: 10/16/13

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13 HONORABLE RICHARD SEEBORG
14 United States District Court Judge
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